jurisdictions. Several parties suggest that prior to considering 311 for non-emergency calling, the Commission should focus on making ubiquitous 911 emergency calling. As noted above,[156] thirty years ago, AT&T designated 911 for access to emergency services, and this First Report and Order declines to alter this designation for 911.[157] Decisions to implement 911 service continue to be made locally. We do not require local jurisdictions to implement 911 because they are best fit, as they are with 311, to determine the need for it.

40. Some of the concerns that lead certain parties to suggest alternatives to a national N11 number for non-emergency calls, such as a three digit number without "11" as the last two digits (such as 222), an 800 number, or a seven-digit number,[158] are the same reasons that have led us to find an N11 number superior to those alternatives: namely, the similarity to 911. While it may be technically possible to implement the alternatives above, the similarity between an N11 number and 911 will make the non-emergency number both easy to remember and easy to use, thus resulting in greater reduction of non-emergency calls on 911 emergency circuits. We are confident that, to lessen the possibility of confusion between 311 and 911, local education programs in jurisdictions requesting 311 service, will focus on the importance of continuing to dial 911 in real emergencies. If a local government concludes that an alternative number is working well for non-emergency calling, it may decide not to request 311 implementation. Our assignment leaves the choice to local governments.

41. We deny requests that current non-compliant uses of 311 at the local level be grandfathered. Grandfathering existing uses would make it impossible for a local government, in a jurisdiction that may need to relieve overburdened 911 circuits and in which 311 is already assigned for non-compliant uses to choose to use 311 to obtain that relief. We note, however, that uses of 311 for other purposes prior to the effective date of this First Report and Order may continue until the local government in that area is prepared to activate a non-emergency 311 service. Our actions here are consistent with existing Bellcore guidelines permitting local use of N11 codes provided that such assignments and use can be discontinued on short notice.[159] The need to provide relief, in a timely fashion, when 911 circuits become congested with non-emergency calls makes it unreasonable for us to defer implementation issues to industry fora.

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[156] See footnote 12, supra.

[157] See para. 23, supra.

[158] We note that parties have expressed interest in other abbreviated dialing arrangements generally as alternatives to N11 codes. We discuss these alternatives at para. 59-62, infra. We find that, on the record before us, we are unable to find that the public interest supports national reservation at this time of any alternative dialing arrangements for any particular purpose. See para. 61, infra.

[159] See Network Notes, "Numbering Plan and Dialing Procedures" at 3.4.1.

42. States and local governments may deploy 311 through their 911 centers or devise alternative procedures for routing and answering 311 calls. We acknowledge that a provider of telecommunications services may incur certain costs (for example, in reprogramming switch software) to enable implementation of 311. Since 311 calls, like 911 calls, are typically intrastate, states would regulate cost recovery in most instances.[160] Funding of 311 service also is a local issue.

43. The wireless industry expresses concern about costs and other implementation issues. CTIA,[161] while supporting nationwide reservation of 311 for non-emergency police telephone calls, contends that the Commission must define the scope of 311 service so that CMRS providers are technically capable of providing the service. CTIA states that the Commission should, therefore, address how calls would be routed and terminated. CTIA emphasizes that 311 non-emergency service is separate and distinct from 911 emergency service and argues, therefore, that carriers should not be required to provide the same features or the same terms for 311 service that they do for 911 emergency service (for example, carriers should be able to provide 311 service for a fee). We agree with CTIA that 311 should be used to provide a non-emergency service that is distinct from 911 service. For this reason, it is not our intention by this First Report and Order to impose the same types of obligations on wireless providers with regard to 311 service as we did with regard to 911 service.[162]

44. We deny GSA's request to assign an N11 code specifically for access to federal government services. Even though they are not 911 emergency situations, we find an element of urgency likely attaching to calls to police that is lacking when the public is seeking access to other governmental services. There are other easily remembered numbers available from toll free dialing codes that could give the public prompt and easy access to services for which there is not the urgency associated with calls to local police. We note, however, that the discretion we give local governments to use 311 for other government service access, in addition to non-emergency police access, grants in part NASTD's request for national assignment of an N11 code to facilitate public access to state agencies.

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[160] Cf. 47 U.S.C. § 332(c)(3) (preempting state regulation of rates and entry for CMRS, but allowing the states to petition the Commission for authority to regulate rates in limited circumstances). Section 332 provides that CMRS providers are to be treated as common carriers, but permits the Commission to forbear from applying certain sections of Title II. Specifically, the Commission may forbear from applying any section of Title II, except Sections 201, 202, and 208. See 47 U.S.C. § 332(c)(1)(A). In the CMRS Second Report and Order, the Commission determined that it would be in the public interest to forbear from imposing most Title II requirements on CMRS providers, including tariffing requirements. See Implementation of Sections 3(n) and 332 of the Communications Act, Regulatory Treatment of Mobile Service, Second Report and Order, 9 FCC Rcd 1411, 1463-93 (1994).

[161] See CTIA 311 Comments.

[162] See Wireless E-911 Report and Order and FNPRM, cited at footnote 80, supra.

d. Access to Repair Services (611) and Business Office Uses (811)

45. Some LECs currently use 611 and 811 to facilitate repairs and other customer services. Use of these two codes, however, appears to be far less ubiquitous than use of 411 for directory assistance and 911 for emergency services. For example, unlike 911 emergency service, LECs may use 611, 811, or other unassigned N11 codes for other local services. Several LECs that currently use 611, 811, or both for customer services and internal functions request that they be allowed to continue to use these N11 codes.[163] Because the record does not support reassignment of either of these N11 codes, we conclude that these two codes may continue to be used for their present purposes until one or both of them is needed for other national purposes.

46. With multiple LECs in the local market, access to these codes for repair and business office uses by only one facilities-based carrier serving that market would be anticompetitive. The possibility of anticompetitive effects is not an issue with respect to other facilities-based carriers because 811 and 611 are only used within a carrier's own network. Therefore, a facilities-based LEC can use one or both of these codes even if it is already being used by another LEC. In an effort to ensure that no facilities-based LEC gains an unfair advantage over its competitors, we conclude that: (1) all providers of telephone exchange service, both incumbents and new market entrants, whether facilities or non facilities-based providers of telephone exchange service, should be enabled to use the 611 and 811 codes for repair services and business office uses as the incumbent LECs do now; and (2) by dialing these N11 numbers, customers should be able to reach their own carriers' repair or business services. These conclusions are consistent with the Act's requirement that all LECs permit competing providers of telephone exchange service and telephone toll service to have nondiscriminatory access to telephone numbers.[164]

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[163] See, e.g., Ameritech Comments at 4; SNET Comments at 2.

[164] See 47 U.S.C. § 251(b)(3). We note that the Commission, in Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, FCC 96-325 (rel. Aug. 8, 1996) (First Interconnection Order), motion for stay of the FCC's rules pending judicial review denied, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 96-378 (rel. Sep. 17, 1996), partial stay granted, Iowa Utilities Board v. FCC, No. 96-3321, 1996 WL 589204 (8th Cir. Oct. 15, 1996) (Iowa Utilities Board v. FCC) (Local Competition First Report and Order) found that CMRS providers (specifically cellular, broadband PCS and covered SMR), in addition to meeting the statutory definition of telecommunications carriers, also provide telephone exchange service and exchange access as defined by the Act. This means that these CMRS providers would have nondiscriminatory access to telephone numbers from LECs. See Local Competition First Report and Order at para. 1012-1013. The Commission declined to treat CMRS providers as LECs at this time. See id. at para. 1004. Therefore, the requirements imposed on LECs in Section 251(b)(3) do not apply to CMRS providers.

e. Directory Assistance (411)

47. Like 911 for access to emergency services, 411 has long been assigned for access to local directory assistance services. Because directory assistance queries are often made while travelling away from one's regular residence or place of business, a short, easy-to-recall, uniform nationwide code would be very useful for obtaining telephone numbers. For these reasons, we find continued use of 411 to call local directory assistance services justified by public convenience and necessity. Accordingly, as we proposed in the N11 NPRM, we do not alter the assignment of the 411 code. The number 555-1212, like 411, is a nationally-recognized number for directory assistance.[165] U S WEST, in its comments, noted:

> The 555 central office code, or prefix, is generally used for access to LEC directory assistance services. Typically, an end user dials 1+555-1212 to reach his/her LEC's 'local' directory assistance service. For directory assistance for an area code different than the area code from which the call originates . . . the end user dials 1-[area code]-555-1212.[166]

U S WEST suggests expanding the 555 prefix to information service providers. U S WEST suggests that "to avoid potential conflicts with existing directory assistance services, it might be useful to reserve the 555-1XXX series of numbers for directory information and related services."[167] The Commission, in the recent Local Competition Second Report and Order, concluded that no Commission action was necessary "with respect to the ability of customers to reach directory assistance services through 411 or 555-1212 arrangements"[168] and decided not to require any alternatives to these two codes for access to directory assistance. By concluding here that the assignment of 411 for such local services should continue, we do not intend to foreclose the use of 555-XXXX or any other dialing arrangements for such services.

48. In view of reports that some LECs were planning to use 411 for new information service offerings that would be classified as enhanced services under our rules,[169] the N11 NPRM sought comment on whether LEC use of 411 should be restricted to the provision of traditional directory assistance services.[170] Several commenters argue that we

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[165] See Local Competition Second Report and Order at para. 149.

[166] U S WEST Comments at 13.

[167] Id. at 14.

[168] Id. at 151.

[169] See footnote 8, supra, for a definition of "enhanced services."

[170] See N11 NPRM at para. 11. By "traditional" directory assistance services we refer to operator provision of local telephone numbers. The Commission has determined that traditional directory assistance services are "adjunct" to basic services and are regulated pursuant to Title II of the Communications Act. See Amendment of Section

should link a decision to allow a particular LEC to provide enhanced services through 411 with a decision to direct assignment of N11 codes to information service providers competing with that LEC.[171] Others argue that 411 should always be restricted to basic directory assistance.[172] While we encourage LECs to expand the range of services they offer to the public, we recognize the possible competitive advantage that LECs would be given if they were able to use N11 codes for their enhanced services offerings. We conclude, therefore, that a LEC may not itself offer enhanced services using a 411 code, or any other N11 code, unless that LEC offers access to the code on a reasonable, nondiscriminatory basis to competing enhanced service providers in the local service area for which it is using the code to facilitate distribution of their enhanced services.[173] LECs offering enhanced services through the use of an N11 code are subject to rules designed to protect against discrimination and possibly other anticompetitive conduct.[174] Moreover, the Bell Operating Companies (BOCs) are subject to additional safeguards pursuant to Computer III.[175] For example, BOCs offering such services today must file and receive approval of comparably efficient interconnection (CEI) plans.[176] Such measures will help ensure that competing enhanced service providers will have access to basic transmission facilities on an unbundled and

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64.702 of the Commission's Rules and Regulations, 77 FCC 2d 384 at para. 421 (1980) (Computer II), modified on recon, 84 FCC 2d 50 (1980) (Computer II Reconsideration Order), modified on further recon., 88 FCC 2d 512 (1981) (Computer II Further Reconsideration Order), aff'd sub nom., Computer and Communications Industry Assoc. v. FCC, 693 F.2d 198 (D.C. Cir. 1982), cert. denied, 461 U.S. (1983).

[171] See, e.g., Ameritech Comments at 3; Pacific Comments at 4; USTA Comments at 30.

[172] See, e.g., Mobile Comments at 2.

[173] We note that the Commission has established its ancillary jurisdiction over enhanced services in its Computer II decision. See Computer II at paras. 124-125.

[174] See, e.g., Computer II at para. 231.

[175] See Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer III), CC Docket No. 85-229, Phase I, 104 FCC 2d 958 (1986) (Phase I Order), recon., 2 FCC Rcd 3035 (1987) (Phase I Recon. Order), further recon., 3 FCC Rcd 1135 (1988) (Phase I Further Recon. Order), second further recon., 4 FCC Rcd 5927 (1989) (Phase I Second Further Recon.), Phase I Order and Phase I Recon. Order vacated, California v. FCC, 905 F.2d 1217 (9th Cir.1990) (California I); Phase II, 2 FCC Rcd 3072 (1987) (Phase II Order), recon., 3 FCC Rcd 1150 (1988) (Phase II Recon. Order), further recon., 4 FCC Rcd 5927 (1988) (Phase II Further Recon. Order), Phase II Order, vacated, California v. FCC, 905 F.2d 1217 (9th Cir.1990); Computer III Remand Proceedings, 5 FCC Rcd 7719 (1990) (ONA Remand Order), recon., 7 FCC Rcd 909 (1992), pets. for review denied, California v. FCC, 4 F.3d 1505 (9th Cir.1993) (California II); Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, 6 FCC Rcd 7571 (1991) (BOC Safeguards Order); BOC Safeguards Order vacated in part and remanded, California v. FCC, 39 F.3d 919 (1994) (California III).

[176] See, e.g., Bell Operating Companies Joint Petition for Waiver of Computer II, 10 FCC Rcd 13758 (Com. Car. Bur. 1995).

functionally equivalent basis.[177] These conclusions are also consistent with the Act's requirements that all LECs permit competing providers of telephone exchange service and telephone toll service to have nondiscriminatory access to directory assistance and to telephone numbers,[178] and that BOCs, before they are permitted to offer in-region, interLATA services, must show that the access or interconnection they offer to other telecommunications carriers includes, among other things, nondiscriminatory access to directory assistance services.[179]

f. Access to Telecommunications Relay Services

49. Background. NCLD's petition requests that two N11 numbers be assigned or reserved for TRS access.[180] It states that under the ADA, common carriers are required to provide TRS, a telephone transmission service designed to provide persons with speech or hearing disabilities functionally equivalent access to the telephone network.[181] NCLD argues that assignment of N11 numbers will facilitate TRS access and thus further the goals of the ADA. NCLD states that variations among and within states in the TRS numbers assigned make access to the relay service confusing and difficult. NCLD also states that access can be especially difficult for TTY[182] users because they cannot directly call directory assistance, and thus cannot easily determine the local relay number. In addition, NCLD argues that an N11 number would significantly reduce the number of digits that must be dialed when placing a relay call. NCLD explains that many relay centers have an eleven digit 800 number, and that as many as twenty-one digits (eleven to reach the relay center, and ten to reach the final destination) may be needed to complete a call. Finally, NCLD notes that while a majority of states use two numbers for relay access, one for access by TTY users and one for access by voice users, approximately seventeen states use only one number for both TTY and voice

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[177] See Phase I Order at para. 147.

[178] See 47 U.S.C. § 251(b)(3). See footnote 164, supra, for a discussion of the application of this provision of the Act to CMRS providers.

[179] 47 U.S.C. § 271(c)(2)(B)(vii)(II).

[180] TRS allows people with hearing or speech disabilities to use the telephone. TRS facilities are equipped with specialized equipment and staffed by communications assistants who relay conversation between people who use text telephones and people who use traditional telephones. The Commission issued a Notice of Inquiry (NOI) seeking comment on TRS issues in Telecommunications Relay Services, the Americans with Disabilities Act of 1990, and the Telecommunications Act of 1996, Notice of Inquiry, CC Docket No. 90-571, FCC 97-7, ___ FCC Rcd. ___, (Released January 14, 1997) (TRS NOI). This TRS NOI, states that it will not include consideration of assignment of N11 numbers to access TRS because that issue is pending before the Commission and will be addressed in this proceeding. See id. at n. 6.

[181] See 47 U.S.C. § 225(a)(3), (c).

[182] TTY is a teletypewriter, which is a device for communicating alphanumeric information over telecommunications networks.

callers.

50. Comments. Most commenters support reservation or assignment of a nationwide N11 code for TRS access. Commenters agree that a uniform N11 code will reduce confusion, provide quicker dialing and promote TRS use.[183]

51. States filing comments generally support assignment of nationwide N11 codes for TRS access.[184] In particular, the Attorney General of the State of Illinois (Illinois) supports the allocation of both 711 and a second N11 number to access TRS on a nationwide basis.[185] Texas, relying on the ADA, states that it believes that a nationwide assignment of N11 codes for TRS is appropriate.[186] The Florida Public Service Commission (Florida), however, while noting that it does not oppose the assignment of 711 and the use of another N11 code for access to TRS systems, observes that its investigation of the use of N11 codes, in which it decided not to reserve N11 codes for TRS access, has revealed that "other numbers such as 555-XXXX or 1-800-XXX-XXXX could be better suited and more easily converted to TRS access."[187] Florida asserts that any Commission rulemaking should "address N11 access in comparison with other potential access arrangements . . . ."[188]

52. LECs generally favor reservation of a single N11 code for TRS access, but question whether an N11 assignment is appropriate at this time.[189] Commenters supporting an N11 reservation, rather than assignment, generally argue that a number of policy and technical issues must be resolved before a nationwide N11 code for TRS can be implemented.[190] Bell Atlantic states that a dialing arrangement that automatically routes all TRS callers to a single TRS provider would place other TRS providers at a competitive disadvantage.[191] GTE warns

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[183] See, e.g., Louisiana Relay Comments at 1; Leigh Comments at 1; Life After Deafness/California Comments at 1; Gallaudet/Kapi'olani Comments at 1. Comments and reply comments cited in paragraphs 30-36 are responding to the NCLD petition.

[184] See, e.g., Oregon Public Utility Commission Comments at 1; Attorney General of the State of Illinois Comments at 1; State of Texas Comments in response to Emergency Petition for Rulemaking by National Center for & Deafness and Telecommunications for the Deaf, Inc (hereinafter NCLD/TDI petition) at 3.

[185] Illinois Comments at 1.

[186] Texas Comments in response to NCLD/TDI petition at 3.

[187] Florida Reply Comments at 3.

[188] Id.

[189] See U S WEST Comments at 3-4.

[190] See, e.g., SWBT Comments at 1-7; U S WEST Comments at 3-4.

[191] Bell Atlantic Comments at 4.

that a "flashcut" to N11 access, on either a nationwide or statewide basis, would require a heavy commitment of resources, would be difficult to coordinate, and would create network problems during implementation and testing.[192] GTE suggests that industry fora could resolve technical issues and could establish a state by state schedule for implementation.[193]

53. Noting that N11 codes are a scarce resource, several parties suggest alternative solutions such as a uniform nationwide 800 number, 555-XXXX number, or 950-XXXX number for TRS access. Cox contends that technical and operational issues render N11 numbers unsuitable for providing uniform access to relay service in the near future.[194] Cox, in its December 12, 1995, ex parte presentation, reiterated its position that there should be no N11 numbers reserved for national use for access to TRS.[195] Cox presented three general reasons for its position: (1) N11 cannot provide "ubiquity" in that it would not be possible to make the code available to all subscribers, regardless of their location; (2) N11, because of the needed modifications in switches around the country, is too expensive for such a non-commercial use; and (3) N11 is best suited for purely local services because, for example, current network architectures support such use, and there are no comparable resources available for local services. Cox asserts that 800 service would and should be made available for TRS access. Cox notes that 800 service is designed for regional and nationwide coverage. It asserts that, especially with 800 number portability, a national 800 number for TRS access would be ubiquitous and much less expensive than an N11 number. U S WEST asserts that "it is clear that not all U S WEST end offices have the capability to replace the current 800 numbers [through which it accesses service arrangements to route TRS calls] with a 711 telephone number."[196] U S WEST suggests that, until technical issues are resolved, "the industry should promote the deployment of a single national 800 telephone number that can direct calls to the nearest TRS bureau."[197] It asserts that with a national 800 number using geographic routing, each originating call would go to the nearest TRS provider. As noted above, Florida, while stating that it does not oppose the assignment of 711 and the use of another N11 code for access to TRS systems, suggests the need for a Commission investigation into alternatives to an N11 code, such as an 800 number.[198]

54. Other parties, however, assert that an 800 number, necessitating dialing many

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[192] GTE Reply Comments at 9.

[193] GTE Comments at 9.

[194] Cox Reply Comments at 3-6.

[195] Cox December 12, 1995 Ex parte Presentation.

[196] U S WEST Comments at 5.

[197] Id. at 7.

[198] Florida Reply Comments at 3.

digits, is not a viable alternative to an N11 number for TRS access. Illinois, for example, states that an 800 number necessitates dialing 17 digits, thus doubling the length of time to dial, and adds that currently each state has one or more different telephone numbers to access TRS. Illinois asserts that the existence of multiple numbers may pose difficulties for those travelling to various states:

> In Illinois, for example, voice users and TTY users of the TRS must dial one of two 1-800 numbers to access TRS. If a person who is severely hard of hearing, deaf, or has speech disabilities travels from another state to Illinois and attempts to make a telephone call using TRS, he/she must know the 1-800 number or know someone who knows the number or must have access to a current telephone book, because one can only reach directory assistance (411) through the relay service, not directly by TTY. This is especially frustrating for those who travel to many different states.[199]

The State of Wisconsin, Department of Health and Social Sciences (Wisconsin), in advocating reservation of an N11 number for TRS, expresses concern that currently "deaf/hard of hearing and speech impaired users of the relay [service] must dial a 11-digit (800) number to access the service, then enter the 7 or 10-digit number they wish to call."[200] According to Wisconsin, this necessity fails to provide "equal access in telecommunications." The Triangle Association of the Deaf (Triangle) notes a similar problem with the use of 1-800 numbers for access to TRS: "often more than 17 numbers must be dialed before reaching the called party, which can double the length of time on the line needed to dial for relay users."[201] NCLD, in its reply comments, refers to the Commission proceeding that resulted in its July 26, 1991 issuance of rules implementing title IV of the ADA. Those rules imposed minimum guidelines regarding TRS service:

> [i]ncluded within the reply comments of [over 70 organizations submitting comments to the FCC] was a request that access to relay services be made available through a single 800 nationwide telephone number set aside through the North American Numbering Plan. The Commission responded that because 800 numbers are assigned to particular carriers, it did not find it feasible to establish a single, nationwide relay number at that time. Nevertheless, even then, the Commission recognized the benefits of a universal number: 'We encourage state systems and all other relay providers to use numbers that are easy for consumers to remember and would further the goal of nationwide

[199] Illinois Comments at 2.

[200] Wisconsin Comments at 1.

[201] Triangle Comments at 1.

access . . . .'[202]

55. Discussion. We conclude that an N11 code, specifically 711, should be assigned for TRS use. We agree with parties asserting that certain issues related to technical and operational capability, cost, and competition, must be resolved before a nationwide N11 code for TRS access can be implemented. We address such issues in the FNPRM. We tentatively conclude that nationwide implementation of 711 for TRS access should occur within three years of the effective date of this First Report and Order and we seek comment on this proposal. Three 800-855-XXXX numbers have been allocated for TRS access by the Industry Carriers Compatibility Forum (ICCF) of the Alliance for Telecommunications Industry Solutions.[203] In the FNPRM, we state that we do not anticipate any conflict between allowing activation of the 800-855-XXXX numbers and the later implementation of a 711 code for access by individuals with hearing or speech disabilities to TTY. The 711 code, unlike the 800 codes, will support three digit access to TTY by people with hearing or speech disabilities. We believe this offers distinct advantages to such persons for whom, as commenters note, the time on the line before reaching the called party would possibly be doubled due to the number of digits that access through an 800 number would require. A nationwide N11 code would also eliminate the current need for TRS users travelling from state to state to remember different lengthy 800 numbers for each state.

56. An N11 code may significantly facilitate TRS access, thus furthering the goals of both the 1996 Act[204] and the ADA. In particular, a nationwide N11 code will significantly reduce the number of digits that must be dialed when placing a relay call, and will eliminate the problem of determining the appropriate local relay number. We also note that most commenters agree that assignment of an N11 code for TRS is in the public interest. Because N11 codes are a scarce resource, and because many states already provide TRS access for both TTY and voice users through a single number, we conclude that only one N11 number

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[202] NCLD Comments at 8, note 6, quoting Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990, Report and Order and Request for Comments, CC Docket No. 90-571 at para. 42.

[203] The entire 855 "NXX" code, within the 800 area code, has been reserved for disability access. NXX refers to the first three digits of a North American local telephone number and identifies the local central office. N represents any digit from 2 to 9 and X is any digit. Of the approximately ten thousand numbers associated with this NXX code, three have been specifically reserved by the industry for access by persons with speech or hearing disabilities.

[204] The Act requires that telecommunications services, telecommunications equipment, and customer premises equipment be accessible to persons with disabilities, if readily achievable. The duty to ensure accessibility is imposed on: (1) telecommunications service providers regarding their services; and (2) equipment manufacturers regarding their telecommunications equipment and customer premises equipment. See 47 U.S.C. § 255. The Commission released a Notice of Inquiry on September 19, 1996, beginning the Commission's implementation of Section 255. See In the Matter of Implementation of Section 255 of the Telecommunications Act of 1996, Notice of Inquiry, WT Docket No. 96-198, FCC 96-382, 61 Fed. Reg. 50465 (September 26, 1996) (Section 255 NOI).

should be used for TRS. Moreover, because Hawaii and Canada already use 711 for TRS access, and because uniformity would facilitate access to TRS, we conclude that 711 is the most appropriate code to support TRS access. We, therefore, determine that 711 should be assigned as a national code for TRS use, and we direct Bellcore, in its capacity as NANP administrator, to assign 711 for such use as of the effective date of this First Report and Order.

4. Statutory Preemption

57. The Act gives the Commission exclusive jurisdiction over numbering in the United States.[205] Because the Commission's jurisdiction is exclusive, the states have no authority to permit the use of N11 codes in a manner inconsistent with the conclusions reached in this First Report and Order. As noted above, the release of the N11 NPRM and the filing of the comments and replies all occurred prior to enactment of the 1996 Act amendments to the 1934 Act. Insofar as they discuss the issue of preemption, therefore, they have become moot.[206]

58. Moreover, we find that a nationwide, uniform system of numbering is essential to the efficient delivery of interstate and international telecommunications.[207] Despite the fact that most individual N11 calls are likely to be intrastate, N11 numbers, like 911, have significance that go beyond state boundaries. At times, an end user who is travelling can dial the same N11 code used at home to access the same service accessed at home. In order to achieve the maximum public benefit from the allocation of particular codes to certain services, those codes must be allocated in a consistent manner on a nationwide basis.

5. Other Issues

a. Alternate Abbreviated Dialing Arrangements

59. Background. In the N11 NPRM, the Commission stated that other abbreviated dialing arrangements, such as "XX#" or "*XX", might accommodate many times the number

[205] See 47 U.S.C § 251(e)(1).

[206] Few commenters addressed the preemption issue directly. The State of Texas noted that the FCC does not have general preemptive authority over the assignment of N11 codes used for "purely intrastate uses" but conceded that Title IV of the ADA provides authority for the "FCC to require the uses of a particular N11 code for access to interstate relay programs and to condition approval of state programs on the use of the same code." See Texas Comments in response to NCLD/TDI petition at 3, citing 47 U.S.C. §§ 225(b)(2), (c)(2), (d).

[207] See NANP Order at para. 26; Ameritech Order at para. 13.

of providers that N11 service codes could serve.[208] We said that using these arrangements, however, might require substantial time to implement and be expensive. For example, if "#" were required in an abbreviated dialing arrangement, dialing could not occur from millions of rotary telephones still in service. Moreover, "#" and "*" are used today to activate switch capabilities, not for customer dialing. It is noteworthy, however, that with CLASS services, if it is not possible to use "*XX" dialing, for example with a rotary telephone, "11XX" is an alternative abbreviated dialing arrangement.[209] The N11 NPRM invited comment on the feasibility of requiring abbreviated dialing arrangements to be made quickly available in lieu of or in addition to requiring exchange carriers to make N11 codes available.

60. Comments/Discussion. The record shows that there is considerable interest in alternative abbreviated dialing arrangements.[210] Some commenters seek abbreviated numbers in only one local calling area,[211] while others seek a uniform abbreviated number for an entire state, a region, or the whole country.[212] Commenters suggest using numbers with two to four digits plus a "*" or a "#", such as *XX or NXX#. One commenter suggests codes with "**X."[213]

61. We conclude that abbreviated dialing could clearly serve many useful purposes and we urge industry fora to continue to explore the feasibility of their use. When those entities identify abbreviated dialing arrangements that would be practical, both economically and technically, we encourage them to develop reasonable guidelines for the implementation and allocation of the related numbers. In addition, we ask the NANC to explore how rapidly abbreviated dialing arrangements could be deployed and to report back to the Commission on this issue. On the record before us, however, we are unable to find that the public interest supports national reservation at this time of any alternative dialing arrangements for any particular purpose, except as previously described in this First Report and Order.

62. While we decline to make any national assignment or other reservation of

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[208] See N11 NPRM at para. 19. By "alternate dialing arrangements," we mean arrangements other than the conventional seven and ten digit sequences that facilitate recall and use by the general public. "Abbreviated dialing arrangements" are alternate dialing arrangements that involve less than seven and usually four or fewer dialing digits."xx#" is an example where "X" may be any number from 0 to 9.

[209] CLASS is a set of calling party number (CPN)-based services, such as caller ID, auto call return, selective call forwarding and other services.

[210] See, e.g., Alternative Newspapers Comments at 4; Cox Comments at 4; Advance Reply Comments 2; Cox Reply Comments at 29.

[211] See, e.g., Cox Comments at 4.

[212] See, e.g., Mobile Comments at 3; MCI Reply Comments at 7.

[213] PBS/PG Comments at 3.

abbreviated dialing arrangements at this time, we reiterate that no federal policy bars the use of such arrangements for intrastate service offerings.

b. Recall Procedures

63. Background/Comments. In the N11 NPRM, the Commission solicited comment on methods for recalling N11 service codes and any notice periods that should precede such recalls.[214] Several commenters express concern that this Commission or state commissions will be unable to recall on short notice those N11 codes that have been made available for local uses.[215] They request establishment of specific time periods and other procedures for recall to avoid any unreasonable delay if the public convenience and necessity requires that assigned N11 codes be used for other purposes.

64. Discussion. We believe it unnecessary to adopt specific rules for future recall of N11 codes at this time. First, widely distributed industry numbering documents consistently and unambiguously state that an N11 code assignment is not a permanent assignment and is subject to termination on short notice.[216] Second, when state commissions have allowed N11 use, their authorization orders, which, by the terms of the Commission's Local Competition Second Report and Order remain in effect,[217] consistently state that such use is subject to termination or other modification on short notice, typically six months.[218] If an N11 assignee is unable or unwilling to cooperate in a national recall of an N11 code, we would not hesitate to order termination of the switching services necessary to the functioning of that N11 code or to take other action required to make the N11 code available for other purposes. In the event of a national recall, the Commission will take such action as necessary to give interested parties sufficient notice of the recall and an opportunity to be heard on how the recall should be enforced. Moreover, as the time needed for code relinquishment could vary depending on the use of codes in question, parties will further be given an opportunity to address the network, customer, and administrative concerns that affect recall.

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[214] N11 NPRM at para. 13.

[215] See, e.g., SWBT Comments at 9-10.

[216] See Network Notes, "Numbering Plan and Dialing Procedures" at 3-8. As stated above, Network Notes does not define short notice.

[217] See para. 13, supra.

[218] See, e.g., Request for Approval of Tariff Filing to Introduce N11 Service, Order Regarding N11 Abbreviated Dialing, Docket No. 920962-TL, Florida Public Service Commission, Nov. 4, 1993 (noting that Southern Bell's tariff clearly states that any and all N11 codes could be recalled by the NANP at any time, and if so, must be relinquished within six months).

6. Regulatory Flexibility Act

65. See Appendix E, infra, for the Final Regulatory Flexibility Analysis.

IV. FURTHER NOTICE OF PROPOSED RULEMAKING

A. Introduction

66. The proposals below, and the comments we seek regarding them, are part of our analysis of the Commission's role with respect to numbering administration. The guiding principal shaping these proposals is that a uniform numbering plan is an essential prerequisite to an integrated public switched telephone network. There must be a single, consistent set of numbering principles allowing all switching equipment connected to the network to route every call to its correct destination. Concomitant with the need for one uniform numbering plan is the imperative that any numbering plan be capable not only of serving incumbents, but also of accommodating new market entrants. For this reason, we have attempted, wherever possible, to ensure that new telecommunications carriers have access to numbering resources on the same basis as incumbents.

B. Access to Telecommunications Relay Services

67. While we believe that an N11 code to support nationwide TRS access is in the public interest, it is not clear, as several commenters note, whether it is technically feasible to implement such a code at this time.[219] We specifically request parties to address whether there can be nationwide implementation of an N11 code and how to address less than nationwide implementation, if network facilities of some telecommunications carriers preclude use of N11 for TRS access. Parties should also address the following issues: (1) how competition among relay providers would be maintained; (2) whether implementation is technically feasible and, if so, the details of such implementation; (3) the projected costs of implementation and how those costs should be recovered; and (4) what effect, if any, nationwide implementation of an N11 code for TRS access will have on CMRS providers and their networks.

68. We tentatively conclude that nationwide implementation of 711 for TRS access should occur within three years of the effective date of the First Report and Order and we seek comment on this proposal. Sprint, we note, has projected this as a reasonable timeframe

[219] For example, there are technical issues associated with the switch modifications necessary to route N11 calls on a local basis. Configuring the dialing arrangements to enable relay service users to choose interexchange carriers is another technical issue.

for switched-based N11.[220] We understand switched-based N11 in the context of TRS to mean that the N11 dialing information would be stored in the switch, and when TRS users in a calling area dial the N11 code, the telecommunications carrier's end office switch would automatically route the call to the relay center. We understand from Sprint that such implementation may not permit end users to select a preferred TRS provider.[221] We ask that interested parties comment on what steps must be taken to ready the network for use of 711 as the TRS code and whether these steps can be completed in the three year timeframe or perhaps even sooner. We ask parties addressing implementation issues to present a timeline for completion of steps they foresee as necessary to introduce 711. We also ask parties if it would be possible to develop within a reasonable time an N11 "gateway" offering access to multiple TRS providers. With such a gateway, a database query would be launched, and parties would be able to select their TRS providers, or parties would have their calls routed to a presubscribed TRS provider. In addition, we request comment on whether any other important disability services could be accessed through the same gateway and whether such a gateway would be consistent with Section 255 of the Act.[222] We request comment on whether, with such gateway access, TRS calls would still be answered within our mandatory minimum standards for TRS answer times, which require 85% of calls to be answered within 10 seconds.[223] Finally, we request comment from interested parties, particularly TRS providers, about the possibility of providing both voice and text TRS services through the same abbreviated N11 code.

C. Sale or Transfer of N11 Codes

69. Background. In the N11 NPRM, the Commission identified the extremely limited number of service codes available in each geographic area. The Commission stated that because these codes may acquire some value, holders of these codes may wish to sell or transfer their numbers to others.[224] Accordingly, the Commission sought comment on whether N11 codes should be permitted to be sold or transferred.[225]

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[220] Switched-based N11 is only one example of an architectural arrangement supporting the use of N11. Another example may be an arrangement using intelligent network capabilities.

[221] Sprint Ex Parte presentation of July 24, 1995.

[222] This section of the Act requires that telecommunications services, telecommunications equipment, and customer premises equipment be accessible to persons with disabilities, if readily achievable. The duty to ensure accessibility is imposed on: (1) telecommunications service providers regarding their services; and (2) equipment manufacturers regarding their telecommunications equipment and customer premises equipment. See 47 U.S.C. § 255. The Commission has begun implementing Section 255. See Section 255 NOI, cited at footnote 204, supra.

[223] See 47 C.F.R. § 64.604(b)(2).

[224] N11 NPRM at para. 15.

[225] Id.

70. Comments. Most commenters oppose the transfer or sale of N11 numbers.[226] They argue that the assignment of a public resource, such as N11 codes, does not confer property rights upon the assignee.[227] Some commenters support the transfer or sale of N11 codes, but urge the Commission to develop and enforce rules regarding such transfers and that the transfer or sale be limited to companies that merge or are acquired.[228]

71. Discussion. The Commission has stated that carriers do not "own" codes or numbers but rather administer their distribution for the efficient operation of the public switched telephone network.[229] The Commission, also on several occasions, has further characterized telephone numbers as a national public resource.[230] Based on our review of the record, we tentatively conclude that N11 codes should not be transferred or sold through private transactions at this time. N11 codes are not only essential public resources that serve important national and state goals, but are also much more scarce than other codes. Parties are asked to comment on our statutory authority to sell the right to use N11 codes. We also ask parties to distinguish statutory authority to sell the right to use N11 codes from the right to sell other abbreviated dialing arrangements.

D. Administration of N11 Codes

72. As stated above, prior to enactment of the 1996 Act amendments to the 1934 Act, Bellcore, the states, the incumbent LECs, and the Commission each performed functions relating to the administration of N11 codes. Since the AT&T divestiture, Bellcore has served as the administrator of the NANP. Bellcore has assigned N11 codes at the national level. In addition, the Commission may direct Bellcore to assign an N11 code for national use if the Commission determines that such a national assignment is in the public interest.

73. Bellcore, in its role as NANP administrator, has issued specific guidelines

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[226] See, e.g., AT&T Comments at 7; U S WEST comments at 21.

[227] See, e.g., Sprint Reply Comments at 7; USTA Comments at 19-20, 31.

[228] See, e.g., Rochester Comments at 4; Mobile Comments at 4; Mtel Comments at 7;

[229] See The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Memorandum Opinion and Order, 59 Rad. Reg. (P&F)1275,1284 (1986). We note that Bellcore, as current administrator of the NANP, also has characterized numbers as a public resource and has specifically rejected that the assignment of a number implies ownership by either the assignor or assignee. See Personal Communications Services N00 NXX Code Assignment Guidelines, Para. 2.10 (April 8, 1995 Revision).

[230] See, e.g., NANP Order at para. 4 (stating that telephone numbers are a public resource); The Need to Promote Competition and Efficient Use of Spectrum for Radio Common Carrier Services, Declaratory Ruling, 2 FCC Rcd 2910, 2912 (1987), recon., 4 FCC Rcd 2369 (1989) (stating that NXX codes are a national resource).

addressing the use of N11 codes.[231] These guidelines permit local use of N11 if such assignments and use can be discontinued on short notice.[232] In states where N11 codes have been used locally, state public utilities commissions have directed the LECs to assign and administer these codes. The specific procedures for assignment of N11 codes for local use vary from state to state. Three local N11 codes have been assigned for particular uses in at least some LEC service areas (411 for local directory assistance; 611 for LEC repair service; and 811 for LEC business office use).

74. As part of our analysis of the Commission's role with respect to numbering administration, we seek comments below on issues related to administration of N11 codes. The Commission had already embarked on an extensive analysis of its role with respect to numbering prior to enactment of the 1996 Act amendments to the 1934 Act. The Commission, in adopting a new model for administration of the NANP in the NANP Order, decided not only that the NANP administrator's existing functions will be transferred to a neutral entity to be recommended by the NANC, but also that "the functions associated with CO code administration shall be transferred from the LECs to the new NANP administrator no more than 18 months after the transfer of the existing NANP administrative functions from Bellcore to the new administrator has been completed."[233]

75. We propose that the administration of N11 codes for local use, to the extent that this administration was done by the incumbent LECs prior to enactment of the 1996 Act amendments to the 1934 Act, and would otherwise continue under the terms of this First Report and Order and the Commission's Local Competition Second Report and Order, should instead be transferred from the incumbent LECs to the neutral NANP administrator to be recommended by the NANC. We propose that the transfer occur with the transfer of the functions associated with CO Code administration.[234] We seek comment on our proposal.

E. Procedural Matters

1. Ex Parte Presentations

76. This is a non-restricted notice-and-comment rulemaking proceeding. Ex parte presentations are permitted, except during the Sunshine Agenda period, provided that they are

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[231] See Network Notes "Numbering Plan and Dialing Procedures."

[232] Id.

[233] NANP Order at para. 115.

[234] The Commission did not intend to limit the functions to be transferred to the new entity to those specifically listed in the NANP Order. The Commission stated there that it seeks recommendations from the NANC on several issues, one of which is "[w]hat number resources, beyond those currently administered by Bellcore, as the NANP administrator, should the new NANP administrator administer?" Id. at para. 118.

disclosed as provided in the Commission's rules. See generally 47 C.F.R. §§ 1.1202, 1.1203, 1.1206. Written submissions, however, will be limited as discussed below.[235]

2. Regulatory Flexibility Act

77. See Appendix F, infra for the Initial Regulatory Flexibility Analysis.

F. Comment Filing Procedures

78. General Requirements. Pursuant to applicable procedures set forth in sections 1.415 and 1.419 of the Commission's rules, 47 C.F.R. §§ 1.415, 1.419, interested parties may file comments on or before **March 31, 1997**, and reply comments on or before **April 30, 1997**. To file formally in this proceeding, you must file an original and twelve copies of all comments, reply comments, and supporting comments. If you want each Commissioner to receive a personal copy of your comments, you must file an original and 16 copies. Comments and reply comments should be sent to Office of the Secretary, Federal Communications Commission, 1919 M Street, N.W., Room 222, Washington, D.C. 20554, with a copy to Janice Myles of the Common Carrier Bureau, 1919 M Street, N.W., Room 544, Washington, D.C. 20554. Parties should also file one copy of any documents filed in this docket with the Commission's copy contractor, International Transcription Services, Inc., 2100 M Street, N.W., Suite 140, Washington, D.C. 20037. Comments and reply comments will be available for public inspection during regular business hours in the FCC Reference Center, 1919 M Street, N.W., Room 239, Washington, D.C. 20554.

79. Other requirements. In order to facilitate review of comments and reply comments, both by parties and by Commission staff, we require that comments be no longer than seventy-five (75) pages and reply comments be no longer than thirty-five (35) pages, including exhibits, appendices, and affidavits of expert witnesses. Empirical economic studies and copies of relevant state orders will not be counted against these page limits. These page limits will not be waived and will be strictly enforced. Comments and reply comments must include a short and concise summary of the substantive arguments raised in the pleading. Comments and reply comments must also comply with Section 1.49 and all other applicable sections of the Commissions rules.[236] We also direct all interested parties to include the name of the filing party and the date of the filing on each page of their comments and reply comments. Comments and reply comments also must clearly identify the specific portion of this Notice of Proposed Rulemaking to which a particular comment or set of comments is responsive. If a portion of a party's comments does not fall under a particular topic listed in

[235] See paras. 78-80, infra.

[236] See 47 C.F.R. § 1.49. We require, however, that a summary be included with all comments and reply comments, although a summary that does not exceed three pages will not count towards the 75 page limit for comments or the 35 page limit for reply comments. The summary may be paginated separately from the rest of the pleading (e.g., as "i, ii"). See 47 C.F.R. § 1.49.

the outline of this Notice, such comments must be included in a clearly labelled section at the beginning or end of the filing. Parties may not file more than a total of ten (10) pages of ex parte submissions, excluding cover letters. This 10 page limit does not include: (1) written ex parte filings made solely to disclose an oral ex parte contact; (2) written material submitted at the time of an oral presentation to Commission staff that provides a brief outline of the presentation; or (3) written material filed in response to direct requests from Commission staff. Ex parte filings in excess of this limit will not be considered as part of the record in this proceeding.

80. Parties are also asked to submit comments and reply comments on diskette. Such diskette submissions would be in addition to and not a substitute for the formal filing requirements addressed above. Parties submitting diskettes should submit them to Gloria Shambley of the Common Carrier Bureau, Network Services Division, 2000 M Street, N.W., Room 235, Washington, D.C. 20554. Such a submission should be on a 3.5 inch diskette formatted in an IBM compatible form using MS DOS 5.0 and WordPerfect 5.1 software. The diskette should be submitted in "read only" mode. The diskette should be clearly labelled with the party's name, proceeding, type of pleading (comment or reply comments) and date of submission. The diskette should be accompanied by a cover letter.

V. ORDERING CLAUSES

81. Accordingly, IT IS ORDERED, pursuant to Sections 1, 4(i), 201-205 and 251(e)(1) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154(i), 201-205, and 251(e)(1), that the First Report and Order is hereby ADOPTED.

82. IT IS FURTHER ORDERED, that Bellcore, as the NANP administrator, shall assign 711 as a national code for TRS use as of the effective date of this First Report and Order, as discussed in this First Report and Order.

83. IT IS FURTHER ORDERED, that Bellcore, as the NANP administrator, shall assign 311 as a national code for access to non-emergency police and other government services as of the effective date of this First Report and Order, as discussed in this First Report and Order.

84. IT IS FURTHER ORDERED, that when a provider of telecommunications services receives a request from an entity to use 311 for access to non-emergency police and other government services in a particular jurisdiction, it must ensure that, within six months of the request: (1) entities that were assigned 311 at the local level prior to the effective date of this First Report and Order relinquish non-compliant uses; and (2) it takes any steps necessary (for example reprogramming switch software) to complete 311 calls from its subscribers to a requesting 311 entity in its service area.

85. IT IS FURTHER ORDERED, that (1) all providers of telephone exchange service, both incumbents and new market entrants, whether facilities or non facilities-based

providers of telephone exchange service, should be enabled to use the 611 and 811 codes for repair services and business office uses as the incumbent LECs do now; and (2) by dialing these N11 numbers, customers should be able to reach their own carriers' repair or business services.

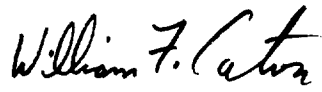
86. IT IS FURTHER ORDERED, that a LEC may not itself offer enhanced services using a 411 code, or any other N11 code, unless that LEC offers access to the code on a reasonable, nondiscriminatory basis to competing enhanced service providers in the local service area for which it is using the code to facilitate distribution of their enhanced services.

87. IT IS FURTHER ORDERED, that the North American Numbering Council will explore how rapidly abbreviated dialing arrangements could be deployed and report back to the Commission on this issue.

88. IT IS FURTHER ORDERED that GSA's request for a national N11 assignment is DENIED and that NASTD's request for a national assignment is GRANTED IN PART as discussed in this First Report and Order, and otherwise DENIED.

89. IT IS FURTHER ORDERED, pursuant to Sections 1, 4(i) and (j), 201-205, 218 and 251(e)(1) of the Communications Act as amended, 47 U.S.C. Sections 151, 154(i), 151(j), 201-205, 218 and 251(e)(1), that the Further Notice of Proposed Rulemaking is hereby ADOPTED.

FEDERAL COMMUNICATIONS COMMISSION



William F. Caton

Acting Secretary

Appendix A
Comments Filed on N11 NPRM
CC Docket 92-105

Comments

1. Ad Hoc Telecommunications Users Committee (Ad Hoc)
2. Alternate Weekly Newspapers, New Times, Inc., Sasquatch Publishing, City Pages, and Tuscon Weekly (Alternative Newspapers)
3. American Public Communications Council (APCC)
4. American Telephone and Telegraph Company (AT&T)
5. Ameritech Operating Companies (Ameritech)
6. Anchorage Telephone Utility (ATU)
7. Bell Atlantic Telephone Companies (Bell Atlantic)
8. Bell Communications Research, Inc. (Bellcore)
9. BellSouth Telecommunications, Inc. (BellSouth)
10. BT North America (BONA)
11. Canadian Steering Committee on Numbering (CSCN)
12. Central Telephone Company (Centel)
13. Cox Enterprises, Inc. (Cox)
14. Datatrex
15. Florida Public Service Commission (FPSC)
16. GTE Service Corporation (GTE)
17. Infocom International, Incorporated (Infocom)
18. Information Technology Association of America (ITAA)
19. Information Industry Association (IIA)
20. LO/AD Communications (LO/AD)
21. MCI Telecommunications Corporation (MCI)
22. Metropolitan Fiber Systems, Inc. (MFS)
23. Mobile Connections, Inc. (Mobile)
24. Mobile Telecommunications Technologies Corporation (Mtel)
25. National Telephone Cooperative Association (NTCA)
26. Newspaper Association of America (NAA)
27. NYNEX Telephone Companies (NYNEX)
28. Pacific Bell and Nevada Bell (Pacific)
29. Puerto Rico Telephone Company (PRTC)
30. Rochester Telephone Corporation (Rochester)
31. Southern New England Telephone (SNET)
32. Southwestern Bell Telephone Company (SWBT)
33. Sprint Corporation (Sprint)
34. Telesector Resources Group (Telesector)
35. United States Telephone Association (USTA)
36. U S WEST Communications, Inc. (U S WEST)

Reply Comments

1. Advance Publications, Inc. (Advance)
2. AT&T
3. Ameritech
4. Bell Atlantic
5. Bellcore
6. BellSouth
7. BONA
8. Cox
9. Datatrex
10. First Financial Management Corporation (FFMC)
11. FPSC
12. GTE
13. Illinois Commerce Commission, Indiana Utility Regulatory Commission, Michigan Public Service Commission, Public Utilities Commission of Ohio, Public Service Commission of Wisconsin (Ameritech Regional Regulatory Committee, or ARRC)
14. Information Industry Association (IIA)
15. LO/AD
16. MCI
17. Mtel
18. National Center for Law and Deafness (NCLD)
19. New York State Department of Public Service (NYPDS)
20. Newsday
21. NYNEX
22. Organization for the Protection and Advancement of Small Telephone Companies (OPASTCO)
23. Pacific
24. PBS/The Print Group
25. Sprint
26. SWBT
27. United Cerebral Palsy Association, Inc. (UCPA)
28. USTA
29. U S WEST

Appendix B
Comments Filed on TRS Petition

Comments

1. Access Independence and Mobility
2. Ad Hoc
3. ALDA California Style
4. ALDA Sacramento
5. Alexander Graham Bell Association for the Deaf, Inc.
   American Council of the Blind
6. American Society for Deaf Children
7. American Speech-Language Hearing Association
8. Ameritech
9. Anderson. Herker
10. AT&T
11. Baltimore's Empowered Advocates for the
    Right's of Deaf and Hard of Hearing People
12. Bell Atlantic
13. BellSouth
14. Bourne-Firl, Bridgetts
15. Center for Media Education
16. Chicago Hearing Society
17. Commonwealth of Massachusetts
18. Cox and Dallas Morning News
19. Deafness Education Advocacy Foundation
20. Eakes, Dorothy
21. Eakes, Malcolm
22. Fitts, Beth
23. Gallaudet University Regional Center- Ohlone College
24. Gallaudet University Regional Center- Kapiolani Community College
25. General Communications, Inc.
26. GTE
27. Hamilton Telephone Co.
28. Hawaii State Coordinating Council on Deafness
29. Helen Keller National Center
30. Illinois Commerce Commission, Indiana Utility Regulatory Commission,
    Public Utilities Commission of Ohio, Public Service Commission of Wisconsin
31. Illinois, Attorney General
32. Illinois Alliance for the Hearing Impaired
33. Jacksonville Community Center for the Deaf
34. Jacob, Philip
35. Joint Commission Indiana Utility Reg. Comm.,
    Illinois Commerce Commission, PUC of Ohio and the PSC of Wisconsin

36. Jones, Samuel
37. Lake County Center for Independent Living
38. Leigh, Irene
39. Life After Deafness Magazine- Gayle McCullough
40. Life After Deafness
41. LING Inc.
42. Mame Telecommunications Relay Service Advisory Committee
43. McBroom, Betty
44. MCI
45. Minnesota Telecommunications Access for Communication-Impaired Persons Board
46. Missouri Commission for the Deaf
47. National Technical Institute for the Deaf
48. National Association of the Deaf
49. New York Society for the Deaf
50. North Carolina; Division of Services for the Deaf and Hard of Hearing
51. North Country Club of the Deaf
52. Northern Virginia Resource Center for Deaf and Heard of Hearing Persons
53. NYNEX
54. Oregon Public Utility Commission
55. Oregon Association of the Deaf, Inc.
56. Pacific
57. People Mutual Telephone Company, Inc.
58. Public Utility Commission of Texas
59. Relay Texas Advisory Committee
60. Riker, David
61. Rochester Institute of Technology
62. Schaumberg Township Disabled Services
63. Self Help for Hard of Hearing People
64. South Carolina Telecommunications Relay Service Advisory Committee
65. South Carolina Budget and Control Board
66. SWBT
67. Springfield Center for Independent Living
68. Sprint Corporation for Sprint Communications Co. LP
& The 69. United and Centel Telephone Companies
70. Still, G. Howard
71. Telecommunications for the Deaf, Inc.
72. Telecommunications Relay Services Advisory Council
73. Texas Attorney General
74. Texas, Public Utility Commission
75. Triangle Association of the Deaf
76. USTA
77. United States Department of Agriculture
78. USDA- Southwestern Region
79. U S WEST Communications, Inc.

80. Virginia Department for the Deaf and Heard of Hearing (VDDHH)
81. Walker, Kristina Leitch
82. Washington Post Company
83. Wisconsin, Department of Health and Social Services
84. WisTRS

Reply Comments

1. Alexander Graham Bell Association for the Deaf
2. Association of Late Deafened Adults
3. Bell Atlantic
4. BellSouth
5. Chicago Hearing Society
6. Florida PSC
7. General Communication, Inc.
8. GTE
9. Illinois Alliance for the Hearing Impaired
10. Joint Parties (Cox and Dallas Morning Times)
11. Minnesota
12. National Association of the Deaf
13. National Center for Law and Deafness
14. National Fraternal Society of the Deaf
15. Nevada Bell
16. Newspaper Association of America
17. Pacific Bell
18. Pacific Telesis
19. Saks, Andrea
20. Self Help For Hard of Hearing People, Inc.
21. SWBT
22. Sprint Corporation, on Behalf of:
    Sprint Communications Company LP
    United & Central Telephone Companies
23. Telecommunications for the Deaf, Inc.
24. USTA
25. Washington Post